

IN THE UNITED STATES DISTRICT COURT
OF THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

ARMSTRONG JACOB KNIGHT, #100175

PLAINTIFF

vs.

CIVIL ACTION NO. 1:05cv186LG-JMR

SHERIFF GEORGE PAYNE, JR., et al

DEFENDANTS

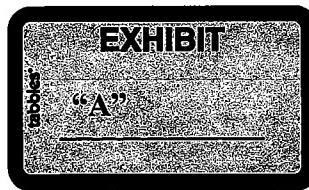
STATE OF MISSISSIPPI

COUNTY OF HARRISON

**AFFIDAVIT OF GEORGE PAYNE, JR.
SHERIFF OF HARRISON COUNTY**

PERSONALLY CAME AND APPEARED BEFORE ME the undersigned authority in and for the County and State aforesaid, the within named, GEORGE PAYNE, JR., who, after first being duly sworn by me on his oath, did depose and state the following:

1. My name is George Payne, Jr. and I am the duly elected Sheriff of Harrison County and have held this position since January 1, 2000. I have personal knowledge of the matters and facts contained in this Affidavit, and I am competent to testify to the matters stated herein.
2. As Sheriff of Harrison County, I have first hand knowledge of the maintenance and/or storage of records of the Harrison County Sheriff's Office and the policies of said office.
3. When a written request for medical care is submitted by an inmate, it is the policy of the Harrison County Adult Detention Center as provided in the Harrison County Adult Detention Center Policy and Procedures



Directives that "*All inmates incarcerated in the Harrison County Adult Detention Center will have access to medical, dental and mental health services as needed to maintain basic health*". "*Staff members of the facility will not take deliberate action designed to block, deny or delay access of an inmate to health care services*". A copy of the Health Care Services section is attached hereto as **Exhibit "1"**.

4. As set forth in the written policy, health care services at the Detention Center are contracted by Harrison County with Naphcare, Inc., sick call is provided to all inmates daily, excluding weekends and holidays. Sick call is conducted by a Registered Nurse, Nurse Practitioner or Physician. As deemed necessary by the examining Registered Nurse, inmates are referred to the next level of care, and appropriately scheduled for timely physical examinations by the Physician. Inmates whose conditions require care beyond that available at the Detention Center are referred for hospitalization by the Physician. In addition, Naphcare, Inc. is responsible for ensuring the availability of specialty care services that meet the needs of the inmates.
5. To the best of my knowledge, Health Assurances, LLC provides adequate and proper medical services to the inmates pursuant to its contract with Harrison County. I ensure that the staff at the Detention Center, including myself, do everything possible to provide the inmates with access to medical care.

6. At no time did I personally participate in any decision or decisions relating to the medical care and treatment of Armstrong Jacob Knight. I never received information or otherwise became aware that Jacob Armstrong Knight had any medical need or was in any way exposed to a substantial risk of serious damage to his future health.

I certify the above declaration is true and correct under penalty of perjury.

/s/George Payne, Jr.
Affiant/George Payne, Jr.
Sheriff of Harrison County, Mississippi

Sworn to and subscribed before me on this the 27th day of February, 2006.

/s/James Darwin McMahan
Notary Public

My Commission Expires: 04/20/07

(SEAL)